

Pembrokeshire County Council - Integrated Impact Assessment (IIA)



Please refer to the corresponding detailed guidance document before/during completion. An IIA must be Completed for all Council / Cabinet reports that recommend a formal decision relating to;

- Significant changes to service provision
- Significant expenditure or savings
- Any course of action which is significant in terms of its effects on local communities.

Lead Officer	Director / Head of Service	Service / Department	Date
Sue Jones – Licensing Lead	Gaynor Toft	Housing and Public Protection	27/07/2026

Title of report / project:	Taxi Licensing Policy
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What is the proposal being assessed?

Approval of an overarching Taxi and Private Hire Licensing Policy for PCC including updated licence conditions in line with Welsh Government guidance.

Updates to policies / conditions include:

- Mandatory DBS Update Service registration for licensed drivers to facilitate 6 monthly DBS checks in line with Welsh Government guidance
- Updated medical frequency for drivers in line with Welsh Government guidance. Medical standards Group2 is already adopted, so the standard is not raising, just the frequency of testing, to bring it into line with other Welsh authorities and Welsh government standards. Frequency will be less for drivers under the age of 65 years
- Updated Suitability Criteria (Convictions policy) in line with Institute of Licensing standards published October 2024 and Welsh Government guidance, will apply to both operators and vehicle proprietors as well as drivers.
- Enhanced safeguarding and disability awareness training for new drivers in line with Welsh Government guidance
- Stronger operator responsibilities for complaints and record keeping in line with Welsh Government guidance
- Introduction of a minimum Euro 6 emissions standard for new vehicles from January 2027 to promote a greener, less polluting fleet.

This document is divided as follows;

Section 1 Consultation and Engagement

Section 2 Data and Evidence

The following sections ask you to assess the impact of your proposal in view of;

Section 3 Well-being of Future Generations (Wales) Act 2015

Section 4 Pembrokeshire County Council's Well-being Objectives

Section 5 Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
and the Socio-economic Duty (Sections 1 – 3 of the Equality Act 2010)

Section 6 Welsh Language (Wales) Measure 2011

Section 7 Environment (Wales) Act 2016 – Section 6 Duty

Section 8 Decarbonisation and Climate Change – Pembrokeshire County Council Net Zero Carbon by 2030

Section 9 Armed Forces Covenant Duty

Section 1 – Consultation and Engagement

Please provide details of consultation and engagement undertaken to support the proposal, taking into account the Gunning Principles of public consultation which state that a consultation is only legitimate when the following principles are met;

1. Proposals are at a formative stage - decisions must not have been made or pre-determined
2. There is sufficient information to give 'intelligent consideration' - information relating to the consultation must be available, accessible and easily interpreted so that consultees are able to provide an informed response
3. There is adequate time for consideration and response – the consultation period must be long enough to provide sufficient opportunity for consultees to take part
4. Consideration must be given to consultation responses before a decision is made – can you provide evidence of this?

On-line consultation questionnaire prepared will be accessed by 'Have your Say' pages on PCC website and open for consultation for 6 weeks during Aug / Sept 2026.

All taxi and private hire licence holders will be notified of the consultation via an internally produced Taxi Newsletter – sent out via email.

The consultation exercise will be highlighted to the taxi trade in any correspondence sent out or engagement with the trade during the consultation period.

Responses will be considered by Licensing Committee before making any amends, as appropriate, and approving adoption of the policy.

Section 2 – Data and Evidence

Please provide details of data and evidence that has been used in the development of the proposal, e.g. reports, local or national data, service user feedback, outcomes of previous consultations, business plans etc. (Specific evidence relating to legislative requirements should be added to the relevant sections 3-9 below.)

PCC does not have an overarching taxi policy it has adopted various licence conditions and policies in relation to taxi licensing. [The Department of Transport's Statutory Taxi and Private Hire Vehicle Standards dated July 2020](#) (updated Nov 2022) and the [Welsh Government Harmonisation of Taxi and Private Hire Licensing in Wales](#) both recommend that Licensing authorities have an overarching taxi policy.

Updated conditions also stem from the Welsh Government harmonisation of Taxi and Private hire licensing in Wales and all Wales Taxi Working Group.

Section 3 – Well-being of Future Generations (Wales) Act 2015

The following guidance provides more information on the Well-being Goals and Sustainable Development
<https://www.gov.wales/well-being-future-generations-act-essentials>

Which of the following National Well-being Goals does the proposal have an impact on or contribute to delivering?

National Well-being Goal	Positive impacts: please describe the positive impacts	Negative – please explain any negative impacts	No impact – please provide an explanation:
- A prosperous Wales - A resilient Wales - A healthier Wales - A more equal Wales	To provide a policy document with conditions that shape the image and style of passenger transport within Pembrokeshire. To bring about harmonisation of licensing policies across Wales. The changes recommended by both Welsh Government and the Department of Transport (DfT) are to improve public safety,		

• A Wales of cohesive communities • A Wales of vibrant culture and thriving Welsh language • A globally responsible Wales	consistency of standards, harmonized enforcement, increased accessibility and better standards of customer service To ensure the safety of passengers. The private hire and hackney carriage trade provide a key service to the most vulnerable and diverse needs of the public. The hackney Carriage/private hire trade provide the ability for residents to travel between communities in the county and beyond. The safety of passengers is of primary consideration which requires drivers, vehicle proprietors and operators to be vetted in relation to their fitness and suitability		
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What will be done to minimise or mitigate any negative impacts identified above?

Sustainable Development Principle

The Sustainable Development Principle means that when making decisions, the Council needs to take account of the impact these decisions could have on people living in Wales in the future, by considering the following 5 ways of working;

- Long-term
- Prevention
- Integration
- Collaboration
- Involvement

Please outline how you have considered each of these when developing your proposal.

Ways of Working	How has this been considered when developing your proposal?
Long-term	The Taxi Policy will ensure Pembrokeshire has clear guidelines for taxi firms to consider the long-term impact on their business. The policy is required to be reviewed regularly, the DfT standards advocate that any taxi licensing policy is reviewed every 5 years but also consider interim reviews, if there are significant issues arising in the area before that time

Prevention	There is an emphasis on prevention as the policy and licensing process ensures that a number of checks and safeguards are in place before a licence is granted. It places notification requirements on individuals to report matters affecting their suitability during the currency of a licence
Integration	
Collaboration	The harmonized measures proposed in the Welsh Government guidance will ensure that there is a consistency across local authorities in Wales in relation to how licensing authorities will approach the licensing of drivers, vehicle proprietors and private hire vehicle operators. Furthermore, the adoption of the measures advocated by the Department of Transport's Statutory Taxi and Private Hire Vehicle Standards dated July 2020 will be national reaching across the whole of the UK.
Involvement	As above – all Wales involvement. Licensing Lead from PCC sits on the Taxi Licensing Working group with other Licensing managers across Wales and taxi policy officer from Welsh Government. This working group contributes to the work around national standards
Please outline any specific sources of data or evidence to support the information above	

Section 4 – Pembrokeshire County Council's Well-being Objectives

Under the Well-being of Future Generations (Wales) Act 2015, the Council also has a duty to publish Well-being Objectives. Our [Corporate Strategy](#) outlines the Council's Well-being Objectives.

Does your proposal help to deliver against any of the Council's Well-being Objectives? Will it have a positive or negative impact?

Well-being Objective	Positive – please describe the positive impacts	Negative – please explain any negative impacts	No impact – please provide an explanation
Our Future - enabling the best start in life for our children and young people, equipping them with skills for the future	The Taxi and Private Hire trade participate in home to school transport to ensure that learners are provided to transport to schools and colleges to access education		
Our Place – prosperous places, with clean, safe and sustainable environments, where people can live well and thrive	The changes recommended by both Welsh Government and the Department of Transport (DfT) are to improve public safety, consistency of standards, harmonized enforcement, increased accessibility and better standards of customer service.		
Our Communities - caring for people, and enabling active, resourceful and connected communities	To ensure the safety of passengers. The private hire and hackney carriage trade provide a key service to the most vulnerable and diverse needs of the public. More frequent DBS checks facilitated by the mandating drivers to register for DBS update service		Cost of registering for DBS service is £16/year. Currently drivers pay £50 for a DBS check every 3 years Cost is neutral over duration of licence which is 3 years.
Our Council - a financially sustainable, well-governed Council, with a workforce equipped to support the people we serve			

What will be done to minimise or mitigate any negative impacts identified above?

Please outline any specific sources of data or evidence to support the information above

Section 5 – Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Socio-economic Duty (Sections 1 – 3 of the Equality Act 2010)

The Equality Act 2010 requires the Council to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Individuals may have more than one protected characteristic.

Please describe any impacts on the following groups;

Protected Characteristic	Positive – please describe	Negative – please explain any negative impacts	No impact – please provide an explanation
• Age • Disability • Gender reassignment • Marriage and civil partnership • Pregnancy and maternity • Race • Religion or belief • Sex • Sexual orientation	The taxi policy introduces training requirements for new drivers to support people with disabilities when transport is required.	The Taxi policy may exclude some applicants from entering the trade due to the need to meet professional driver medical standard – Group 2	

What will be done to minimise or mitigate any negative impacts identified above?

Taxi drivers are considered professional drivers and whilst Group 2 standard is not mandatory both Department of Transport and Welsh Government recommend this standard for taxi drivers. There is discretion to depart from policy in exceptional circumstances, this would be a sub-committee decision on a case-by-case basis. The overriding consideration is public safety, however.

Group 2 standard is not new it is already adopted, the frequency of testing will be less, in line with other Welsh authorities, Welsh government standards and other professional drivers such as HGV and PSV drivers, actually making it cheaper for drivers aged under 65 years old as they won't need a medical as often. medicals cost £100 - £200 and will no longer be needed every 3 years.

Please outline any specific sources of data or evidence to support the information above

The Socio-economic Duty requires Councils to consider the need to reduce inequalities of outcome which result from socio-economic disadvantage when making decisions.

Socio-economic disadvantage refers to those who live in less favourable social and economic circumstances than others in society. Inequality of outcome relates to measurable differences in outcome between those who have experienced socio-economic disadvantage and the rest of the population. Detailed [guidance](#) can be found on the Welsh Government website.

Please describe the impact the proposal will have.

Positive – please describe the positive impacts	Negative – please explain any negative impacts	No impact – please provide an explanation
It seeks to improve prosperity through employment, assisting tourism and culture		

What will be done to minimise or mitigate any negative impacts identified above?

Please outline any specific sources of data or evidence to support the information above

Section 6 – Welsh Language (Wales) Measure 2011

The Welsh Language (Wales) Measure 2011 and the Welsh Language Standards require the Council to consider the positive or negative impact a proposal may have on opportunities to use and promote the Welsh language, and to ensure that the Welsh language is treated no less favourably than English. Please describe the impact the proposal will have.

Positive - please describe the positive impacts:

The policy supports compliance with the Council's Welsh Language Standards by maintaining bilingual access to licensing information, documentation and services:

- The [Taxi and Private Hire Licensing Policy](#) will be available in English and Welsh as required by the applicant/ licensee.
- Taxi application packs and forms are available in Welsh.
- Taxi training video materials are available in Welsh.
- Council issued signage / vehicle plates and driver badges are all bi-lingual
- [The English policy document states that a Welsh version is available](#) and includes provision for bilingual signage in certain circumstances.

This increases the visibility of Welsh in public transport services and supports Welsh speakers' ability to interact with the licensing authority in Welsh. The provision of bilingual information aligns with the principle that Welsh should not be treated less favourably than English.

In addition, the policy aligns with Welsh Government taxi licensing guidance and All-Wales standards, supporting consistency of service delivery across Wales.

The [policy](#) will not create barriers for Welsh speakers accessing taxi licensing services, making complaints, seeking advice or obtaining information. Existing arrangements for bilingual communications, customer engagement, enforcement activities and public information will remain in place.

Negative – please explain any negative impacts;

Some taxi drivers and operators who do not speak Welsh may perceive language-related requirements as an additional burden.

No impact - please provide an explanation:

What will be done to minimise or mitigate any negative impacts identified or increase positive effects on the Welsh language?

The policy supports bilingual access to licensing information, documentation and services ensuring Welsh is not treated less favourably than English.

We promote awareness of the Welsh language services available, including the right to communicate in Welsh. This supports the active use of Welsh in service delivery.

We will monitor the policy's impact through any complaints, feedback or engagement with licence holders and Pembrokeshire communities.

Conclusion

The policy is primarily concerned with licensing, safety, compliance and service standards rather than language use. The Policy is expected to have a positive impact on the Welsh language:

- Licensing documents, guidance and public-facing information are available bilingually.
- Individuals can communicate with the licensing authority in Welsh where required.

The policy does not create barriers for Welsh speakers accessing taxi services or licensing processes.

Please outline any specific sources of data or evidence to support the information above

According to Census 2021, 17.2% of Pembrokeshire residents aged 3+ reported being able to speak Welsh, slightly below the Wales average of 17.8%. Welsh-speaking populations are concentrated in parts of north and north-east Pembrokeshire, particularly communities bordering Ceredigion and Carmarthenshire, whilst generally lower proportions are found in the south of the county. Welsh language use is not evenly distributed across Pembrokeshire, meaning taxi drivers operating in different parts of the county are likely to encounter Welsh-speaking passengers at different rates

Section 7 – Environment (Wales) Act 2016 – Section 6 Duty

Under Section 6 of the Environment (Wales) Act 2016 the Council must seek to maintain and enhance Biodiversity and in doing so, we must also seek to promote the resilience of Ecosystems.

Does the proposal impact on Biodiversity and the resilience of Ecosystems?					Yes		No	NO
If yes, what is the expected impact of the proposal on biodiversity? Please provide an explanation								
Maintained					Enhanced			
What will be done to minimise or mitigate any negative impacts identified above?								
Please outline any specific sources of data or evidence to support the information above								

Section 8 – Decarbonisation and Climate Change – Pembrokeshire County Council Net Zero Carbon by 2030

In May 2019 the Council voted to declare a climate emergency and in July of the same year voted to develop an action plan to steer Pembrokeshire County Council towards becoming a net zero carbon local authority by 2030. More information about the [action plan](#) is available on the Council's website.

What impacts will the proposal have on the Council's commitment towards becoming a net zero carbon local authority by 2030?

Positive – please describe the positive impacts	Negative – please explain any negative impacts	No impact – please provide an explanation
Introduction of emission standards (minimum of Euro 6) for new vehicles will gradually lead to a less polluting fleet It will prevent excessively old and polluting vehicle being brought onto the taxi fleet for a new licence	Introducing Euro 6 minimum for new vehicles will mean that when drivers replace vehicles, they the vehicle being purchased will likely be more expensive, than a non-Euro 6 compliant vehicle Non-compliant Euro 6 vehicles will no longer be considered for a new licence. Although Euro 6 compliant cars can be up to 11 years old, they are widely available and are not prohibitively more expensive.	

Vehicle proprietors will benefit by not facing ULEZ charging in relevant areas on Euro 6 compliant vehicles.		
What will be done to minimise or mitigate any negative impacts identified above?		
There is a fleet of around 320 licensed vehicles, of these approx. 120 are not Euro 6 compliant. The policy will not apply to these vehicles while they remain licensed and meet with licence conditions. The proposed policy will apply to vehicles being licensed for the first time only to minimise impact on the existing trade and fleet. There will be a short lead in time to introduce the policy for vehicle proprietors to licence new vehicles before the policy applies		
Please outline any specific sources of data or evidence to support the information above		

Section 9 – Armed Forces Covenant Duty

The Council has a legal obligation under the above duty to consider the impact of decisions that impact on serving or former members of the armed forces when delivering functions relating to Health, Housing and Education. In September 2024 Pembrokeshire County Council was awarded the Defence Employer Recognition Scheme Gold Award, underlining the Authority's commitment to support those who keep our nation safe, as well as their families and veterans. Statutory [guidance](#) is available on the Gov.uk website. Please describe the impacts of the proposal on the armed forces community in relation to;

Relevant functions	Positive- please describe the positive impacts	Negative - please explain any negative impacts	No impact – please provide an explanation
Health - Provision of services - Planning and funding - Co-operation between bodies and professionals Housing			No impact

• Allocations policy for social housing • Homelessness Disabled Facilities Grants Education • Admissions • Educational attainment and curriculum • Child wellbeing • Transport • Attendance • Additional needs support			
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What will be done to minimise or mitigate any negative impacts identified above?

Please outline any specific sources of data or evidence to support the information above

Director / Head of Service Approval

Name:	S Jones		
Job Title:	Licensing Lead		
Signature:	<i>S Jones</i>	Date:	27/07/2026